

1 ROBERT G. DREHER
2 Acting Assistant Attorney General
3 Environment & Natural Resources Division
4 United States Department of Justice
5 LESLIE M. HILL (D.C. Bar No. 476008)
6 Leslie.Hill@usdoj.gov
7 Environmental Defense Section
8 601 D Street N.W., Suite 8000
9 Washington D.C. 20004
10 Telephone (202) 514-0375
11 Facsimile (202) 514-8865

12 Attorneys for Defendants

13 [Additional counsel listed on signature page]

14
15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 SIERRA CLUB, *et al.*,

19 Plaintiffs,

20 v.

21 UNITED STATES ENVIRONMENTAL
22 PROTECTION AGENCY, *et al.*,

23 Defendants.

Case No.: 3:13-cv-2809-EDL

**JOINT STIPULATION EXTENDING
TIME FOR DEFENDANTS TO FILE
ANSWER, REQUEST FOR
RESETTING OF INITIAL CASE
MANAGEMENT DEADLINES AND
[PROPOSED] ORDER**

24 The parties stipulate and agree that Defendants' time to answer Plaintiffs'
25 Complaint for Declaratory and Injunctive Relief (Dkt. No. 1) is extended to and including
26 October 21, 2013. This extension will not alter the date of any event or any deadline
27 already fixed by Court order.

28 The parties further request that the Court reset the deadline for filing of the Rule
26(f) Report currently set for September 10, 2013 and the date for the Initial Case
Management Conference ("CMC") currently set for September 17, 2013 at 10:00 am in

1 Courtroom E, 15th Floor, San Francisco (Dkt. No. 4), to allow the parties to engage in
2 settlement discussions. The parties respectfully request that the Court set the following
3 deadlines to provide sufficient time to discuss potential resolution of the case:

| | | |
|---|------------------------------------|-------------------|
| 4 | Rule 26(f) Report | December 3, 2013 |
| 5 | Initial Case Management Conference | December 10, 2013 |

6
7 Respectfully submitted,

8 Date: August 20, 2013

9
10 ROBERT G. DREHER
Acting Assistant Attorney General
Environment and Natural Resources Division
11

12 /s/
13 LESLIE M. HILL (D.C. Bar No. 476008)
U.S. Department of Justice
14 Environment & Natural Resources Division
Environmental Defense Section
15 601 D Street N.W., Suite 8000
Washington D.C. 20004
16 Leslie.Hill@usdoj.gov
Telephone (202) 514-0375
17 Facsimile (202) 514 8865
18

19 *Attorneys for Defendants*

20 Date: August 19, 2013

21
22 /s/ electronic mail authorization
23 PAUL CORT
pcort@earthjustice.org
24 IRENE V. GUTIERREZ
igutierrez@earthjustice.org
25 Earthjustice
26 50 California Street
San Francisco, CA 94111
27 Telephone (415) 217-2000
28

Attorneys for Plaintiffs

~~PROPOSED~~ ORDER

Pursuant to Stipulation, IT IS SO ORDERED.

DATED this 20th day of August, 2013.



ELIZABETH D. LAPORTE
United States Magistrate Judge